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Of Counsel
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2003 APR 23 PM 2:00
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April 22, 2002

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Via Hand Delivery

Re: Complaint of Ben Lomand Communications, Inc. against Citizens Communications
Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee;
Docket No. 02-01221

Dear Chairman Kyle:

Enclosed are the original and fourteen (14) copies of Ben Lomand Communications, Inc.'s
Motion for Leave to File Response to Citizens' Response.

Should you have any questions or require anything further at this time, please do not
hesitate to contact me.

Sincerely,



H. LaDon Baltimore
Attorney for Ben Lomand Communications, Inc.

LDB/dcg
Enclosures

cc: Levoy Knowles
Guilford F. Thornton, Jr., Esq.
Richard Collier, Esq.
James Dempster, Esq.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**COMPLAINT OF BEN LOMAND
COMMUNICATIONS, INC. ,**

Against

**CITIZENS COMMUNICATIONS
COMPANY OF TENNESSEE LLC,
d/b/a FRONTIER COMMUNICATIONS
OF TENNESSEE.**

DOCKET NO. 02-01221

**BEN LOMAND COMMUNICATIONS, INC.'S
MOTION FOR LEAVE TO FILE A REPLY TO CITIZENS' RESPONSE**

Ben Lomand Communications, Inc. ("Ben Lomand"), by and through its undersigned counsel, respectfully submits this Motion for Leave to File a Reply to the Response filed by Citizens Communications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee ("Frontier") on April 10, 2003.

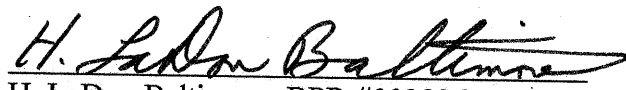
Ben Lomand initiated this case on November 7, 2002. Ben Lomand by challenging a tariff filed by Citizens on April 11, 2002. Under the initial and revised schedule, Discovery Requests and responses were filed. On February 27, 2003, Ben Lomand filed a Motion to Compel Responses to its Discovery Requests. On April 7, 2003, Citizens filed its Response to Ben Lomand's Motion to Compel.

In Frontier's Response, several arguments and reasons for dismissing Ben Lomand's Motion to Compel Responses were set forth. In order to address the assertions in Frontier's Response, Ben Lomand needs to file a Reply.

Tennessee Regulatory Authority Rule 1220-1-2-.06(3) states: "No reply to a response shall be filed except upon leave given upon the order of the Authority or hearing officer." Therefore, in compliance with such Authority rule, Ben Lomand Communications, Inc. hereby requests leave to file a Reply to Citizens' Response.

For the reasons stated herein, Ben Lomand requests leave to file a Reply to Citizens' Response to Ben Lomand's Motion to Compel Discovery.

Respectfully submitted,



H. LaDon Baltimore, BPR #003836

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Counsel to Ben Lomand Communications, Inc.

Certificate of Service

The undersigned hereby certifies that on this the 22nd day of April, 2003, a true and correct copy of the foregoing has been forwarded via first class U. S. Mail, hand delivery, overnight delivery, or facsimile transmission to the following.

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